Accessibility: A Shared Campus Responsibility Best Accomplished with Executive Support

Those of us who are members of the EDUCAUSE IT Accessibility Constituent Group have spent considerable time discussing the importance of the strong executive leadership and planning needed to support the accessibility policies and campus accessibility planning required for compliance with disability legislation. Without planning and leadership, a college or university could find itself among the approximately 400 institutions being targeted—by the activist Marcie Lipsitt—to fix their websites. As a result of some of her complaints, the Office of Civil Rights (OCR) has pursued resolution agreements.

This type of complaint is part of the changing landscape of disability litigation. I believe it reflects the growing frustration of individuals with disabilities who are still experiencing barriers to access based on the web applications and ICT (information and communications technologies) lack of accessibility compliance as outlined in the Web Content Accessibility Guidelines (WCAG). Past complaints are listed within the EDUCAUSE IT Accessibility Risk Statements and Evidence document.

People become frustrated when web applications contain barriers to their participation fully as members of the campus community. It is not sufficient to depend on the individualized services provided by disability services offices as accommodations. Faculty, staff, students, and the public want and need access to technology as outlined in WCAG 2.0 AA. When these standards are met, basic access to technology is more likely to be available without the need to go through a services request. Not every individual with a disability self-identifies as needing an accommodation when much of what is needed could be provided when accessibility standards are met. In addition, people access web applications during nonbusiness hours, and therefore accommodation services may not be available. If web applications are designed with the WCAG 2.0 AA standards as part of the quality assurance process, many users would have access without having to depend on disabilities services professionals. The disability services office would then be able to focus on providing accommodation services when accessibility is not possible up front or when a more prescribed accommodation service is needed.

While we await technologies that are 100 percent accessible, we must proactively work to obtain the most accessible products for users, and we must be ready to assist students with individualized accommodation services. This means that technology is selected, vendors need to be accountable for meeting the accessibility standards to which higher education programs and services are held. Software and hardware development models should blend accessibility compliance testing into their quality assurance evaluations. It is challenging to strike a balance between (1) creating, purchasing, or adopting the most accessible products and (2) meeting the business needs of institutions that are striving to capitalize on the advantages of new technologies. Yet based on the application of current international accessibility compliance standards, technology products can be made largely accessible to all users.

All members of a campus community should know and understand their role to support accessibility compliance in their everyday work life. Most do understand how important it is to create and maintain a community that does not discriminate on race, religion, age, gender, or sexual orientation, but at times it seems that understanding how to avoid discrimination against an individual with a disability is overlooked or misunderstood. Realizing that accessibility is a civil right may require more training for campus communities. Most institutions do not require training in accessibility-related rights—as they do with sexual harassment or information security. Perhaps that can change as we work to provide a more accessible, inclusive campus community for all students, staff, faculty, and the public.

What is needed to assist institutions in improving accessibility compliance is a clear campus accessibility policy, operationalized with procedures and plans with strong support and communication among executive leadership. One best practice is to create an executive steering committee made up of campus administrators including the president, the provost, the CIO, and vice presidents to provide regular communication and ensure adequate resources in support of an accessibility policy implementation. The California State University’s Accessible Technology Initiative (ATI) implementation is using this as a guiding principle. Reporting up to the executive committee are subcommittees and working groups that are tasked with the implementation of goals and objectives. These subcommittees...
should comprise key stakeholder groups and include members with appropriate experience and expertise to inform decision-making. For example, to implement accessibility standards into the procurement process, procurement contract experts would work with IT experts and available accessibility experts.

However, accessibility professionals are not typically plentiful. Efforts are under way to expand the pool of accessibility professionals and to recognize what skills are needed to educate students to develop technologies that are accessible, usable, and meaningful to everyone. Two such entities are the International Association of Accessibility Professionals (IAAP), which provides networking, education, and certification for accessibility professionals; and Teach Access, which works to help identify and address the common challenges of preparing designers, engineers, and researchers to think and build technologies embracing all types of users to develop accessible, universally designed products.

As awareness builds, it is critical to reach beyond the accessibility professionals for support by building capacity to deploy role-based skills training for staff across the campus. Proactively providing institutional capacity for individuals to learn the skills to incorporate accessibility into their job responsibilities and descriptions and overall business practices is critical. These skills would also be applicable to the adoption, creation, or purchase of instructional materials and web applications. Members of the campus community who select instructional materials and web applications could expand the selection criteria for products to include accessibility compliance (e.g., looking to see if the product is keyboard-accessible and functional without the use of a mouse and communicating the accessibility policy and WCAG to the product creator).

Such a large-scale campus endeavor requires project management in order to achieve success in changing behaviors and business practices to reach the goals of any campus accessibility plan. Without executive buy-in, resource allocation to support the business objective will not be allocated. For example, without funding for training or budget allocations for captioning and audio description, progress cannot be made. While many good ideas can come from a bottom-up approach, budget allocation support is top-down. Good implementation of an accessibility policy may seem costly, but when these objectives are not acted on and accessibility is not achieved, the possible outcome from a complaint can be very costly in human resources and funds. OCR resolution agreements have included a short timeline to achieve accessibility compliance including creating an accessibility policy, conducting internal and external audits, remediating barriers, developing and deploying training programs, and hiring appropriate accessibility professionals. Building a strategic accessibility campus plan proactively could help an institution avoid being placed in the position of having one imposed upon them.

As higher education institutions build their capacity and communicate accessibility compliance requirements to vendors, a space for collaboration and interaction to improve vendors’ understanding of campus business needs and accessibility standards can be achieved. This can result in improved levels of accessibility and support within a product. The deeper exploration and collaboration with vendors may lead staff to identify and share with the vendor various feature requests that, when accepted, will allow the product to be more usable by everyone. This can occur while still expecting vendors to train their developers/designers in accessibility standards. Institutions should look for companies with a strong quality assurance program that includes knowledge and accessibility standards training. Designing products based on the elements of universal design principles and accessibility compliance standards will allow users to more fully interact with the functionality of a product. Vendors also find it difficult to identify and hire designers, engineers, and developers with accessibility coding expertise. The Teach Access collaboration network of industry, academia, and advocacy groups works to identify methods to incorporate accessibility standards into educational opportunities for classes such as web development and design.

Establishing executive-supported subcommittees for the accessibility compliance of instructional materials, procurement, and ICT is important as a way to divide up the project plan into manageable pieces, but none of the subcommittees can work independently. Simultaneous collaboration across all areas is critical.

To achieve the cultural change necessary to support accessibility and universal design principles and standards, a cross-functional approach is needed. This requires shared campus responsibility. Not all products meet accessible standards, and accommodations still need to be provided for particular situations; the goal is to avoid having the accommodations process as the first response to overcoming accessibility barriers for an individual using a product. At times, an equally effective and meaningful alternative access plan can provide a temporary solution while a vendor works to remediate accessibility barriers. Temporary solutions like this will have to be planned for and agreed upon by cross-functional teams until more accessible products are found to be commonplace—or until legislation changes to hold creators of ICT products accountable to WCAG standards. Until then, we can continue to communicate to our vendors the need to adhere to accessibility standards, and we can work internally to support an inclusive campus community.

Notes
3. For example, see “Policy at the CSU,” “Goals and Success Indicators,” and “Executive Support;” CSU Professional Development for Accessible Technology (website).
4. See “Vendor Accessibility Requirements;” CSU Professional Development for Accessible Technology (website).
5. See “About Universal Design for Learning;” CAST (website).

Sue Cullen (scullen@calstate.edu) is Assistant Director, Accessible Technology Initiative, for the California State University Office of the Chancellor.